

1 July 1999

2001 N. Adams, 219
Arlington, VA 22201

6404 '99 JUL 26

William Hubbard
Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 98N-1038 -
"Irradiation in the Production, Processing, and Handling of Food"

Dear Mr. Hubbard:

I am extremely concerned about the prospect of weakening the labeling requirements for irradiated food. Any foods that have been treated with irradiation, including those which contain irradiated ingredients, should be clearly labeled as such. The written statement should be clear and easy to read and placed in close proximity to the name of the food on the principal display panel. In addition, it should be accompanied by the radura, the international symbol of irradiated food. If the food is not packaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels, irradiation labels are required by the FDA to be truthful and not misleading. I believe the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling. I recognize the radura as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and radura) should not expire at any time in the future. Doing away with either of these is unfair to new consumers (i.e., young people, immigrants) who may not be familiar with the radura. If there is no label, or if labels are misleading, consumers will not be able to choose whether or not they buy and consume irradiated food.

Don't give in to the industry lobbyists!

Sincerely,



Brett Feldman

98N-1038
JUL 26 1999

C 3174